

1410 NORTH HILTON . BOISE, IDAHO 83706 . (208) 373-0502

JAMES E. RISCH, GOVERNOR TONI HARDESTY, DIRECTOR

August 4, 2006

Certified Mail No. 7005 1160 0000 1550 5813

Mr. Kirk Salvadori Human Resources and Safety Manager Mirage Enterprises, Inc. 2212 Industrial Road Nampa, ID 83687

RE:

Facility ID No. 027-00092, Mirage Enterprises, Inc., Nampa

Final Permit Letter

Dear Mr. Salvadori:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060014 to Mirage Enterprises, Inc., in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on March 29, 2006. This permit is effective immediately and replaces PTC No. P-050001, issued on September 22, 2006, the terms and conditions of which no longer apply. This permit does not release Mirage Enterprises, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0437 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator

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Air Quality Division

MB/CH/bf

Permit No. P-060014

**Enclosures** 

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c: Leonard Herr, Boise Regional Office
Bill Rogers, Permit Coordinator
Casey Huffaker, Permit Writer
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)



# **Air Quality** PERMIT TO CONSTRUCT

# State of Idaho **Department of Environmental Quality**

PERMIT No.: P-060014

FACILITY ID No.: 027-00092

AOCR: 64

CLASS: B

SIC: 3715

**ZONE: 11** 

UTM COORDINATE (km): 536.8, 4826.9

1. PERMITTEE

Mirage Enterprises, Inc.

2. PROJECT

Permit to Construct - Paint Booth No. 1 and No. 2

3. MAILING ADDRESS 2212 Industrial Road	CITY Nampa	STATE ID	ZIP 83687
4. FACILITY CONTACT Kirk Salvadori	TITLE HR and Safety Manager	TELEPHONE (208) 461-7776	
5. <b>RESPONSIBLE OFFICIAL</b> Dale Swikert	TITLE TELEPH (208) 461-		
6. EXACT PLANT LOCATION 2212 Industrial Road, Nampa, Idaho		COUNTY Canyon	

### 7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Cargo trailer manufacturer

### 8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01,200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: August 4, 2006

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# Acronyms, Units, and Chemical Nomenclature

AQCR Air Quality Control Region

DEQ Department of Environmental Quality

IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance with

the Idaho Administrative Procedures Act

km kilometer

O&M operations and maintenance

PM<sub>10</sub> particulate matter with an aerodynamic diameter less than or equal to a nominal 10

micrometers

PTC permit to construct

SIC Standard Industrial Classification

UTM Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060014						
Permittee:	Mirage Enterprises, Inc	Facility ID No. 027 00002	Data Issuedi	August 4, 2006		
Location:						

## 1. PERMIT TO CONSTRUCT SCOPE

# **Purpose**

- 1.1 The purpose of this permit is to allow for the construction of paint booth no. 2. This permit addresses the requirements contained in IDAPA 58.01.01.200-228, Rules for the Control of Air Pollution in Idaho, for issuing PTCs.
- 1.2 This PTC incorporates and replaces PTC No. P-050001 for paint booth no. 1, issued on September 22, 2005, the terms and conditions of which no longer apply.

# Regulated Source

Table 1.1 lists the sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES** 

Permit Section	Source Description	Emissions Control(s)
2	Paint booth no. 1	<ul> <li>A high-tech airless spray gun with 75 to 80% of spray transfer efficiency</li> <li>The paint booth consists of a horizontal drive-through structure equipped with doors at each end and a negative air blower to ensure that paint fumes are contained within the area of the booth</li> <li>The blower pulls air from the interior of the booth through a series of particulate filters to a 36 inch vent</li> </ul>
3	Paint booth no. 2	<ul> <li>A high-tech airless spray gun with 75 to 80% of spray transfer efficiency</li> <li>The paint booth consists of a horizontal drive-through structure equipped with doors at each end and a negative air blower to ensure that paint fumes are contained within the area of the booth</li> <li>The blower pulls air from the interior of the booth through a series of particulate filters to a 30 inch vent</li> </ul>

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### PAINT BOOTH NO. 1

## 2.1 Process Description

An airless spray gun with 75 to 80% transfer efficiency is used in the paint booth. The paint booth consists of a horizontal drive-through structure equipped with doors at each end and a negative air blower to ensure that paint fumes are contained within the area of the booth. The blower pulls air from the interior of the booth through a series of particulate filters to a 36 inch vent located on the roof approximately 28 feet above grade. The flow rate is 23,000 actual cubic feet per minute. The exhaust temperature is 68 °F. The stack does not have a rain cap.

# 2.2 Emissions Control Description

**Table 2.1 PAINT BOOTH DESCRIPTION** 

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Paint booth no. I	<ul> <li>A high-tech airless spray gun with 75 to 80% of spray transfer efficiency</li> <li>The paint booth consists of a horizontal drive-through structure equipped with doors at each end and a negative air blower to ensure that paint fumes are contained within the area of the booth</li> <li>The blower pulls air from the interior of the booth through a series of particulate filters to a 36 inch vent</li> </ul>	Paint booth stack

### **Emissions Limits**

# 2.3 Emissions Limits

The PM<sub>10</sub> emissions from the paint booth stack shall not exceed 7.4 pounds per day.

### 2.4 Opacity Limit

Emissions from the paint booth stack, or any other stack, vent, or functionally equivalent opening associated with the paint booth, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

## **Operating Requirements**

### 2.5 Throughput Limit

The amount of paint sprayed in the paint booth shall not exceed 72 gallons per day.

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### 2.6 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications and recommendations, a pressure drop monitoring device to measure the pressure drop across the spray paint booth filter system.

### 2.7 Operations and Maintenance Manual

By November 22, 2005, the permittee shall have developed an O&M manual for the spray paint booth filter system. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the filter system. The manual shall contain at a minimum, the following: the recommended pressure drop operating range of the filter system; the routine maintenance and repair procedures for the filter system; and the routine replacement schedule for the filters. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request. Once developed, a copy of the manual shall be submitted to DEQ's Boise Regional Office at the following address:

Air Quality Permit Compliance Department of Environmental Quality Boise Regional Office 1445 N. Orchard Boise, ID 83706

It is recommended that the permittee submit a draft copy of the O&M manual for DEQ's review and comment. The draft O&M manual can be sent to the above address.

## 2.8 Pressure Drop Across the Filter System

The pressure drop across the spray paint booth filter system shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

# Monitoring and Recordkeeping Requirements

#### 2.9 Throughput Monitoring

The permittee shall monitor and record the total amount of paint sprayed in the spray paint booth once per day to demonstrate compliance with Permit Condition 2.5. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

### 2.10 Filter System Pressure Drop Monitoring

The permittee shall monitor and record the differential pressure across the spray paint booth filter system once per day when operating to demonstrate compliance with Permit Condition 2.8. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

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## 3. PAINT BOOTH NO. 2

## 3.1 Process Description

An airless spray gun with 75 to 80% transfer efficiency is used in the paint booth. The paint booth consists of a horizontal drive-through structure equipped with doors at each end and a negative air blower to ensure that paint furnes are contained within the area of the booth. The blower pulls air from the interior of the booth through a series of particulate filters to a 30 inch vent located on the roof approximately 28 feet above grade. The flow rate is 23,000 actual cubic feet per minute. The exhaust temperature is 68 °F. The stack has a rain cap.

### 3.2 Emissions Control Description

**Table 3.1 PAINT BOOTH DESCRIPTION** 

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Paint booth no. 2	<ul> <li>A high-tech airless spray gun with 75 to 80% spray transfer efficiency</li> <li>The paint booth consists of a horizontal drive-through structure equipped with doors at each end and a negative air blower to ensure that paint fumes are contained within the area of the booth</li> <li>The blower pulls air from the interior of the booth through a series of particulate filters to a 30 inch vent</li> </ul>	Paint booth stack

### **Emissions Limits**

# 3.3 Emissions Limits

The PM<sub>10</sub> emissions from the paint booth stack shall not exceed 2.5 pounds per day.

# 3.4 Opacity Limit

Emissions from the paint booth stack, or any other stack, vent, or functionally equivalent opening associated with the paint booth, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

# **Operating Requirements**

## 3.5 Throughput Limit

The amount of paint sprayed in the paint booth shall not exceed 24 gallons per day.

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### 3.6 <u>Pressure Drop Monitoring Device</u>

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications and recommendations, a pressure drop monitoring device to measure the pressure drop across the spray paint booth filter system.

### 3.7 Operations and Maintenance Manual

Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the spray paint booth filter system. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the filter system. The manual shall contain, at a minimum, the following: the recommended pressure drop operating range of the filter system; the routine maintenance and repair procedures for the filter system; and the routine replacement schedule for the filters. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request. Once developed, a copy of the manual shall be submitted to DEQ's Boise Regional Office at the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706

It is recommended that the permittee submit a draft copy of the O&M manual for DEQ's review and comment. The draft O&M manual can be sent to the above address.

### 3.8 Pressure Drop Across the Filter System

The pressure drop across the spray paint booth filter system shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

# Monitoring and Recordkeeping Requirements

### 3.9 Throughput Monitoring

The permittee shall monitor and record the total amount of paint sprayed in the spray paint booth once per day to demonstrate compliance with Permit Condition 3.5. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

### 3.10 Filter System Pressure Drop Monitoring

The permittee shall monitor and record the differential pressure across the spray paint booth filter system once per day when operating to demonstrate compliance with Permit Condition 3.8. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

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#### 4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

- 1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
- 2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
- 3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which
    any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and
    conditions of this permit, to inspect any monitoring methods required in this permit, and require
    stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the
    Director.
- 4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
  - A notification of the date of initiation of construction, within five working days after occurrence;
  - A notification of the date of completion/cessation of construction, within five working days after occurrence;
  - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
  - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
  - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date
- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060014						
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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

- 7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- 8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.